



Advocates for Workplace Fairness

February 10, 2021

Via ECF:

The Honorable Gabriel W. Gorenstein
 United States District Court
 for the Southern District of New York
 500 Pearl Street
 New York, New York 10007

Re: Ulku Rowe v. Google LLC, Case No. 19-cv-08655 (LGS)(GWG)

Dear Judge Gorenstein:

Pursuant to your Honor's February 3, 2021 Order (ECF No. 105), the parties jointly propose the following schedule in this matter, revising Your Honor's amendments to the Scheduling Order reflected in ECF No. 83, as follows:

Description	Current Deadline	Proposed Deadline
Plaintiff's identification of fifty (50) alleged comparators for production	-	February 10, 2021
Defendant's objection to the production of documents pertaining to alleged comparators identified by Plaintiff	-	February 19, 2021
Defendant's production of supplemental alleged comparator documents	-	Forty-five (45) days following Plaintiff's identification of alleged comparators.
Completion of depositions ¹ pursuant to Fed R. Civ. P. 33	Fourteen (14) days following the Court's order related to the deposition of Diane Greene.	March 10, 2021
Completion of all expert discovery	Forty-five (45) days following the Court's order on all dispositive motions.	Forty-five (45) days following the Court's order on all dispositive motions.
Pre-Motion Conference Letter Requesting Permission to make a summary judgment motion	Thirty (30) days following the Court's order on the Supplemental Pleadings and Comparator Evidence motions,	Thirty (30) days following Defendant's production of alleged comparator documents

¹ The only deposition to be completed is the continued deposition of Plaintiff Ulku Rowe, as ordered by the Court during the parties' February 3, 2021 oral argument.

The Honorable Gabriel W. Gorenstein

February 10, 2021

Page 2 of 2

	whichever is later	
Date of pre-motion conference before Hon. Lorna G. Schofield	The January 7, 2021, conference before Judge Schofield is adjourned sine die.	The January 7, 2021, conference before Judge Schofield is adjourned sine die.

This is the fourth request to extend discovery deadlines in this matter. The parties thank the Court for its consideration of this matter.

Respectfully submitted,



Kenneth W. Gage
Sara B. Tomezsko
Paul Hastings LLP
200 Park Avenue
New York, NY 10166
Counsel for the Defendant



Cara E. Greene
Maya S. Jumper
Shira Z. Gelfand
Outten & Golden LLP
685 Third Avenue, 25th Floor
New York, NY 10017
Counsel for the Plaintiff

cc: All Parties (via ECF)